



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 31, 2021

BY ECF

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Andrei Razvan Rusu*, S4 19 Cr. 651 (LTS)

Dear Chief Judge Swain:

The Government respectfully submits this letter to request, with the consent of the defendant, a brief extension of the time within which it may file its sentencing submission in advance of the sentencing scheduled for September 9, 2021, at 10:00 a.m.

The Government's sentencing submission currently is due on September 2, 2021. However, the Probation Office does not anticipate filing its final presentence investigation report until tomorrow, September 1, 2021. In order to permit the Government adequate time to consider and incorporate into its submission the final presentence investigation report, including the Probation Office's sentencing recommendation, the Government respectfully requests, with the consent of the defendant, that the Court extend the time within which the Government may file a sentencing submission from September 2 to September 6, 2021.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: *Robert B. Sobelman*
Elizabeth A. Hanft
Samuel P. Rothschild
Robert B. Sobelman
Assistant United States Attorneys
(212) 637-2334/2504/2616

The foregoing request is granted. The Government is directed to file its sentencing submission by 10:00am on September 7th. Docket no. 820 resolved. SO ORDERED.
9/1/2021
/s/ Laura Taylor Swain, Chief USDJ

cc: Grainne E. O'Neill, Esq. (by ECF)